

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
RICHARD STECK, Individually and on Behalf	:	
of All Others Similarly Situated,	:	14-cv-6942 (JPO)
	:	
Plaintiff,	:	<b>RULE 7.1 DISCLOSURE</b>
	:	<b>STATEMENT</b>
v.	:	
	:	
SANTANDER CONSUMER USA HOLDINGS	:	
INC., THOMAS G. DUNDON, JASON KULAS,	:	
JUAN CARLOS ALVAREZ, ROMAN BLANCO,	:	
GONZALO DE LAS HERAS, STEPHEN A.	:	
FERRISS, MATTHEW KABAKER, TAGAR	:	
OLSON, ALBERTO SÁNCHEZ, JAVIER SAN	:	
FELIX, JUAN ANDRES YANES, DANIEL	:	
ZILBERMAN, CITIGROUP GLOBAL MARKETS	:	
INC., J.P. MORGAN SECURITIES LLC, MERRILL	:	
LYNCH, PIERCE, FENNER & SMITH	:	
INCORPORATED, DEUTSCHE BANK	:	
SECURITIES INC., SANTANDER INVESTMENT	:	
SECURITIES INC., BARCLAYS CAPITAL INC.,	:	
GOLDMAN, SACHS & CO., MORGAN STANLEY	:	
& CO. LLC, RBC CAPITAL MARKETS, LLC,	:	
BMO CAPITAL MARKETS CORP., CREDIT	:	
SUISSE SECURITIES (USA) LLC, UBS	:	
SECURITIES LLC, WELLS FARGO SECURITIES,	:	
LLC, KKR CAPITAL MARKETS LLC, SANDLER	:	
O'NEILL & PARTNERS, L.P., STEPHENS INC.	:	
and LOYAL3 SECURITIES, INC.,	:	
	:	
Defendants.	:	
-----	X	

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for defendant Santander Consumer USA Holdings Inc. (“SCUSA”) hereby discloses that SCUSA is a subsidiary of Santander Holdings USA, Inc., which is in turn a wholly-owned subsidiary of Banco Santander, S.A., the parent corporation and public corporation that owns 10% or more of SCUSA’s stock.

Dated: New York, New York  
October 16, 2014

---

Stephen R. DiPrima  
WACHTELL, LIPTON, ROSEN & KATZ  
51 West 52<sup>nd</sup> Street  
New York, New York 10019  
(212) 403-1382  
SRDiPrima@wlrk.com

*Attorneys for Santander Consumer USA  
Holdings Inc.*